

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNITED STATES SUGAR
CORPORATION, UNITED SUGARS
CORPORATION, IMPERIAL SUGAR
COMPANY, and LOUIS DREYFUS
COMPANY LLC

Defendants.

Civil Action No.: 1:21-cv-01644-UNA

**DECLARATION OF MATTHEW WINEINGER IN SUPPORT OF DEFENDANTS’
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(A)**

I, Matthew Wineinger, declare as follows:

1. I am President and Chief Executive Officer of United Sugars Corporation (“United Sugars”), a defendant in the above-listed action. I have been employed at United Sugars since 2015. I am submitting this declaration in support of United States Sugar Corporation (“U.S. Sugar”), United Sugars, Imperial Sugar Company, and Louis Dreyfus Company LLC’s (collectively, “Defendants”), concurrently filed Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) or to Expedite Trial. I am familiar with the issues raised in this action and have personal knowledge of the facts stated herein.

2. United Sugars is a member-owned agricultural cooperative with four members: U.S. Sugar, American Crystal Sugar Company, Minn-Dak Farmers Cooperative, and Wyoming Sugar Company. United Sugars markets and sells the refined sugar that its member-owners, including U.S. Sugar, produce. In addition to U.S. Sugar’s Florida refinery, United Sugars’


member-owners operate sugar refineries in Minnesota, Montana, North Dakota, and Wyoming. None of United Sugars' members operate sugar refineries in Delaware.

3. United Sugars is incorporated in Minnesota and maintains its headquarters in that state. United Sugars does not have any offices, employees, or other physical assets in Delaware, and it does not keep books and records there.

4. Customers in Delaware account for a small fraction of all sugar sold by United Sugars.

5. United Sugars employees travel to Georgia and Florida as part of their sales efforts on behalf of U.S. Sugar and its other members.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I have executed this declaration on December 3, 2021, in Bonita Springs, Florida.



Matthew Wineinger
President and CEO
United Sugars Corporation

CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on December 3, 2021, upon the following in the manner indicated:

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/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (#1014)